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VIA ECF

The Honorable Lorna G. Schofield
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: United States v. Stephen M. Calk, 19 Cr. 366 (LGS)

Dear Judge Schofield:

On behalf of our client Stephen M. Calk, we respectfully request that that Court extend the date by which the parties must advise the Court of proposed redactions (and any dispute relating thereto) to the exhibits appended to the defense's November 8, 2019 pretrial motions.

On November 14, 2019, the Court ordered the parties to propose redactions by December 13, 2019, one week after the government filed its opposition to the motions. Having reviewed the government's opposition, we believe that, in our reply (due December 20, 2019), we may wish to discuss portions of the exhibits that were not specifically referenced in our initial brief. Given that the government has indicated (at least in connection with the defense's opening memorandum) that it has no objection to the public filing of portions of the exhibits that are specifically referenced in the parties' briefs, we respectfully submit that it would be more efficient to defer consideration of redactions until after the defense has filed its reply.

Accordingly, we propose that the letter contemplated by the Court's November 14 order be filed on or before January 6, 2019, which would give the parties sufficient time to confer after the defense has filed its reply brief, taking into account the intervening holiday.

The government advises that it has no objection to this request.

Respectfully submitted,

/s/ Paul H. Schoeman
Paul H. Schoeman
Darren A. LaVerne

cc: All counsel of record (By ECF)